

CHECKLIST FOR SWMU RESPONSE

Name of Facility King Road
 EPA I.D. # PA0 042716084
 Date Received 6/23/86

1. Is facility currently storing less than 90 days. YES ☒ NO ☒

2. Did facility claim that they filed in error YES ☐ NO ☒

3. Description/Number of SWMU's 1
 Land Disposal ☐ Incinerators ☐ Tanks ☐
 Land Treatment ☐ Surface Impoundments ☐ Drums ☐
 Other Concrete pad

4. Is there evidence of contamination YES ☐ NO ☒
 Groundwater: YES ☐ NO ☐
 Surface Water: YES ☐ NO ☐
 Air: YES ☐ NO ☐

5. Certification YES ☒ NO ☐

6. PRIORITY

☒ HIGH----Reported evidence of release to air, ground or surface water.

MEDIUM--No releases reported but land based SWMUs reported.

LOW-----Everything else.

7. Comments:

Sub. to Mr. St. John's to provide information to place drums in container for pickup and to have empty drums removed from site.

Very clean site. No evidence of contamination.



PRODUCTS CORPORATION

HOME OFFICE

P.O. BOX 737
NORRISTOWN, PENNSYLVANIA 19404
TELEPHONE 215-277-1010 CABLE: SPRAYCO

June 18, 1986

RECEIVED
PA SECTION

JUN 23 1986

EPA, R3

Mr. Stephen R. Wassersug, Director
Hazardous Waste Management Division
United States Environmental Protection Agency
Region III
841 Chestnut Building
Philadelphia, Pennsylvania 19107

RE: 3HW33
PAD 042716084

Dear Mr. Wassersug:

You will note from our original application for an interim permit for storage of hazardous waste that there has been only one solid waste management unit on our property, a portion of a 35 foot by 65 foot concrete pad used for the storage of drums.

In 1983, it became apparent that it was not feasible to remain as a storage site, and since that date we have operated on the basis of storing for less than 90 days on the same concrete pad within a diked area.

From early 1975 to the present time, the function of our SWMU has been to provide an impermeable surface on which to place drums of "dirty" wash solvent while awaiting their pick-up for recycling or reclaiming. The site has also been used for storage of empty drums awaiting return to our suppliers or pick-up by a drum reconditioner. Storage areas were always segregated.

Although we have had on occasion leakage or seepage from both full and "empty" drums, the amounts involved have been very small (a quart or less) and, of course, have never constituted a reportable spill nor leaked or seeped beyond the perimeter of the concrete pad. As a matter of fact, most instances have involved "empty" drums where bungs or lids have not been properly secured prior to inverting for short term storage while awaiting pick-up.

Our generated waste has been paint solvents used for cleaning on our production lines. Our paint solvent blend consists of:

<u>CHEMICAL</u>	<u>% by VOL</u>	<u>% by WGT.</u>
Propylene Glycol Monomethyl Ether	5.1	5.6
Methyl Isobutyl Ketone Acetate*	11.5	10.3
Acetone	51.3	45.7
Methylene Chloride	14.0	20.7
Toluene	18.1	17.7
	<u>100.0</u>	<u>100.0</u>

* changed from E.E. Acetate in early 1984.

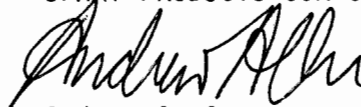
It should be noted that our SWMU has only received waste that was generated on our premises. The amount of waste has been approximately 8,000 - 10,000 gallons (60,000 to 75,000 pounds) per year. We are in the process of attempting to eliminate over ninety-five (95) percent of waste by utilizing the "dirty" wash solvent in paint products where the slight discoloring of the solvent will not affect the end product or coating color.

Enclosed are copies of our Closure and PPC Plans which are on file with Pennsylvania DER. Also enclosed are copies of correspondence with DER following inspections of our site. Finally, as indicated to Mr. Samuel Israel in a telephone conversation, we are having difficulty in getting our surveyor to prepare a topographic map according to your specifications. As soon as it is prepared, we will forward it to your office.

With regard to certification, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete (exception for map noted). I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,

SPRAY PRODUCTS CORPORATION



Andrew A. Orr
President

AAO/ad

Enclosure

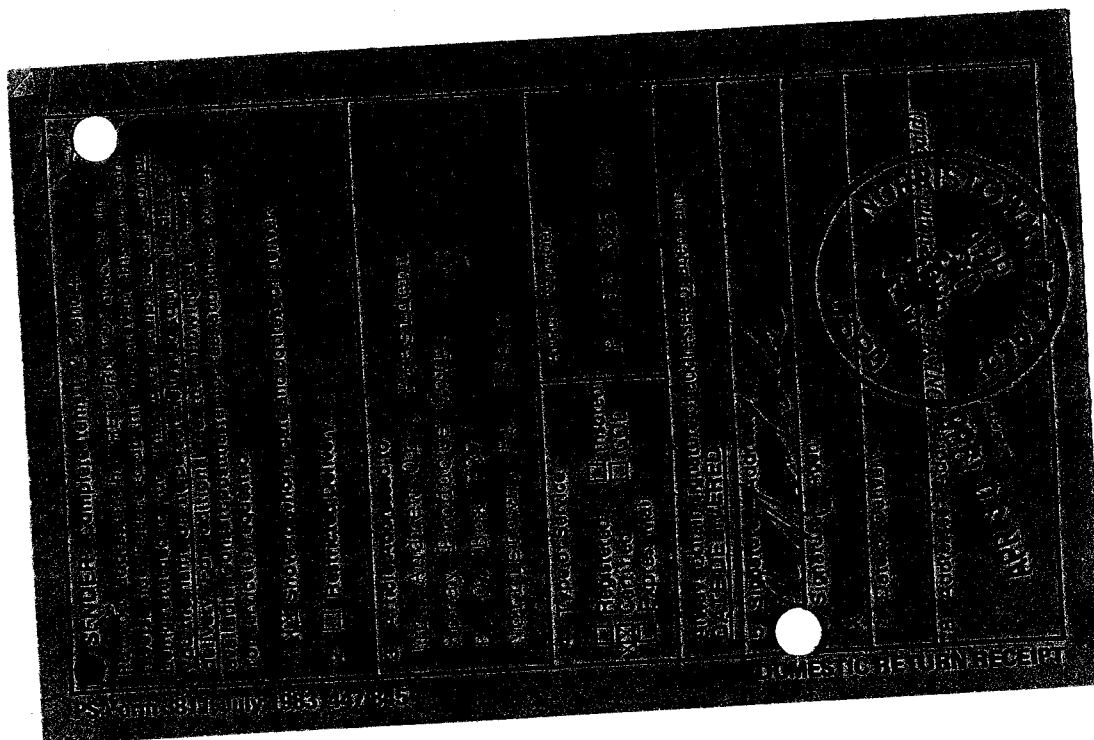
All information you submit should be certified as required by regulation 40 C.F.R. 270.11(d). Should you have any questions concerning this letter, please contact Samuel Israel at (215) 597-9809.

Sincerely,

Stephen R. Wassersug, Director
Hazardous Waste Management Division

Enclosure

cc: Mr. Wayne L. Lynn
Regional Solid Waste Manager
1875 New Hope Street
Norristown, PA 19401



3HW33:S. Israel:E. Elishewitz:7-6797:4/22/86

CONCURRENCES

SYMBOL	3HW33	3HW33	3HW30	3HW00	3HW00			
SURNAME	Israel	Anderson	Allen	Harbold	Schrecongost			
DATE	4/22/86		4/23	4/22				

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

In Reply Refer To: 3HW33

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDMr. Andrew Orr, President
Spray Products Corp.
P. O. Box 737
Norristown, PA 19404

Re: PAD 042716084

Dear Mr. Orr:

Sections 3004(u) and 3008(h) of the Hazardous and Solid Waste Amendments of 1984 (RCRA Reauthorization) give EPA the authority to require corrective action for all releases of hazardous wastes or constituents from any solid waste management unit ("SWMU") as defined on the enclosed sheet. This requirement applies to operating units, inactive units, as well as those that are closing or have been closed in the past.

EPA and the State must first determine the location of all SWMUs at your facility. Next, we must determine whether or not any "releases" (see definitions) originated at these units. In order to enable us to make these determinations, you must provide the following information:

- (1) A topographic map showing the facility and a distance of 1,000 feet around it, at a scale of one-inch equal to not more than 200 feet. In addition to showing the location of the hazardous waste management facilities for which you are seeking a permit, it must locate all existing and former SWMUs at your facility.
- (2) For each SWMU, provide a description of the unit's functions, material of construction, dimensions, capacity, ancillary systems (piping), etc. If available, provide engineering drawings of the units and their foundations. For closed facilities, also provide

★ U.S.G.P.O. 1984-446-014 PS Form 3800, F-6, 1982	Sent to Mr. Andrew Orr, President	
	Spray Products Corp	
	Street and No. P. O. Box 737	
	P.O., State and ZIP Code Norristown, PA 19404	
	Postage	\$
	Certified Fee	
	Special Delivery Fee	
	Restricted Delivery Fee	
	Return Receipt Showing to whom and Date Delivered	
	Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees		\$
Postmark or Date 4/28		